

TIMOTHY D. BARROW, ESQ.
1060 U.S. Route 22 W., Suite 5
Lebanon, New Jersey 08833
(908) 236-2229
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

OPEN VERANDA INC.,

:

CIVIL ACTION 25-01953 – KSH - MAH

Plaintiff,

vs.

BEEONTRADE, INC.; TURKON
CONTAINER TRANSPORT AND SHIPPING
INC.. t/a Turkon Line, and OZAKS CAM
ALINYUM INSAAT SAN. TIC.LTD. STL.,

:

STIPULATION OF VOLUNTARY
DISMISSAL WITHOUT PREJUDICE
PURSUANT TO FED. R. CIV. P. 41 (a)(2)

Defendants.

:

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 41(a)(2), Plaintiff OPEN VERANDA INC., by and through its undersigned counsel, hereby stipulates to the voluntary dismissal of the Plaintiff's Verified Complaint In Admiralty *without prejudice subject to the following Stipulation.*

IT IS ALSO STIPULATED by the Plaintiff herein, through and by its undersigned counsel, that any reinstatement of this action as to Plaintiff's claims shall relate back to the original filing date of the Verified Complaint to avoid any defense of time-bar under the Carriage Of Goods By Sea Act's 1 year time limit to commence suit.

s/ Timothy D. Barrow
TIMOTHY D. BARROW, ESQ.
Attorney for Plaintiff,
OPEN VERANDA INC.

Dated: July 9, 2025
Lebanon, New Jersey

SO ORDERED:

HON. KATHERINE S. HAYDEN, U.S.D.J.
Dated: July , 2025 Newark, New Jersey